

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

C.A. No. 05-10488-JLA

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TIMOTHY HILLS  
Plaintiff

v.

TOWN OF STOUGHTON  
Defendant

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**AUTOMATIC REQUIRED DISCLOSURE PURSUANT TO**  
**FED.R.CIV.P. 26(a) AND LOCAL RULE 26.2**

\_\_\_\_\_ Now comes the Defendant, Town of Stoughton, pursuant to Fed.R.Civ.P. 26(a) and Rule 26.2 of the Local Rules of the United States District Court for the District of Massachusetts and makes the following required disclosures:

**(A) The name and, if known, the address and telephone number of each individual likely to have discoverable information relevant to disputed facts alleged with particularity in the pleadings, identifying the subjects of the information.**

The following are likely to have discoverable information relevant to disputed facts alleged with particularity in the pleadings. Each of the following is able to be contacted via the Town of Stoughton Police Department which is located at the Municipal Building, 10 Pearl Street, Stoughton, MA. Telephone number 781-341-1300 or at the Office of the Police Chief, 781-344-2425.

Chief Manuel Cachopa  
Town Manager Mark Stankiewicz  
Gerald D. Goulston, Chairman, Board of Selectmen  
Sgt. David Cohen, Stoughton Police Department  
Peter Marinelli, address unknown (Avon, MA)  
Sgt. Christopher Ciampa, Stoughton Police Department  
Former Chief Joseph Saccardo, Stoughton Police Department

**(B) A copy of, or a description by category and location of, all documents, date compilations, and tangible things in the possession, custody, or control of the party that are relevant to the disputed facts alleged with particularity in the pleadings.**

The policies and procedures applicable to the Stoughton Police and the Town of Stoughton are available for viewing and photocopying.

**(C) A computation of any category of damages claimed by the disclosing party, making available;**

Not applicable.

**(D) For inspection and copying as under Rule 34, any insurance agreement under which any person carrying on an insurance business may be liable to satisfy part or all of a Judgment which may be entered in the action or to indemnify or reimburse for payments made to satisfy the Judgment.**

The insurer, Legion, was declared insolvent. The applicable entity now handling this claim is the Massachusetts Insurers Insolvency Fund (MIIF).

Respectfully submitted,  
Defendant, Town of Stoughton  
By its Attorneys,

WYNN & WYNN, P.C.

/s/ Charles D. Mulcahy  
Charles D. Mulcahy, Esquire  
BBO#359360  
90 New State Highway  
Raynham, MA 02767  
(508) 823-4567

November 4, 2005

**CERTIFICATE OF SERVICE**

I hereby certify that a true copy of the above document was served upon the attorney of record for each other party by mail on November 4, 2005.

/s/ Charles D. Mulcahy  
Charles D. Mulcahy, Esquire